IN THE STATE COURT OF COBB COUNTY STATE OF GEORGIA

CAMILLE DAUGHERTY,

Plaintiff,

v.

CIVIL ACTION FILE NO. 22-A-4138

RICHARD MORTON, WESTERN EXPRESS, INC., and FREEDOM SPECIALTY INSURANCE COMPANY,

Jury Trial Demanded

Defendants.

<u>DEFENDANT WESTERN EXPRESS, INC.'S NOTICE OF REMOVAL TO UNITED</u> <u>STATES DISTRICT COURT</u>

COME NOW, Defendants **WESTERN EXPRESS, INC.,** and files the following Notice of Removal to United States District Court, showing the Court as follows:

- 1. Defendants have filed a Notice of Removal to the United States District Court. A true and correct copy of the Notice is attached as Ex. "A."
- 2. As a result thereof, this matter is automatically stayed and the action removed to the United States District Court, for the Northern District of Georgia, pursuant to 28 U.S.C. § 1441 *et seq.* Respectfully submitted this 5th day of April, 2023.

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/s/ Sandro Stojanovic SCOTT H. MOULTON Georgia State Bar No. 974237 SANDRO STOJANOVIC Georgia State Bar No. 473114 Counsel for Defendants

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CERTIFICATE OF SERVICE

I hereby certify that on this day I have served a copy of the within and foregoing **DEFENDANT WESTERN EXPRESS, INC.'S NOTICE OF REMOVAL TO UNITED STATES DISTRICT COURT** upon all parties to this matter electronically via E-Filing system and/or by depositing a true and correct copy of same in the United States Mail, in a properly addressed envelope with adequate postage thereon to all counsel of record as follows:

Madeleine Simmons
Nathaniel K. Hofman
Stewart Miller Simmons Trial Attorneys
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This 5th day of April, 2023.

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